

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No. 08-10071-RGS
	)	
	)	
BRIMA WURIE	)	

**MOTION FOR STATUS CONFERENCE AND GOVERNMENT'S STATEMENT OF  
CURRENT STATUS OF SPEEDY TRIAL CALCULATIONS**

The United States of America, by its undersigned attorney, hereby moves for the scheduling of a status conference in this matter. In view of the completion of the of the suppression hearing on January 20, 2009,<sup>1</sup> a Status conference is now appropriate to schedule further proceedings.

The government advises the Court that, based on the hearing date on the suppression motion the Speedy Trial Clock will begin to run as of March 5, 2009. The government believes that the following describes the status of all Speedy Trial Calculations in this case as of March 5, 2009:

4/8/08	gov't motion for detention
4/8/08-5/19/08	Excluded per Court Order dated 4/8/08
5/19/08-6/30/08	Excluded per Court Order dated 5/19/08

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<sup>1</sup> Under applicable provisions of the Speedy Trial Act, the clock in this case will begin to run on March 5, 2009, as the Court provided defense counsel 14 days from the date of the hearing to file a supplemental brief (2/4/09).

6/30/08-8/8/08	Excluded per Court Order dated 6/30/09
8/8/08-1/20/09	Filing of Motion to Suppress and Opposition
1/20/09	Hearing on Motion to Suppress; defense counsel provided an additional 14 days to supplement original filing
2/4/09-3/4/09	Motion under advisement

As of the 3/4/09, 0 days will have been charged against the Speedy Trial Clock and 70 days remain.

Based on the foregoing, the government requests that its motion be allowed and that an order enter requiring that the defendant file a response if it disagrees with any of the calculations set forth above.

Respectfully submitted,

MICHAEL J. SULLIVAN  
UNITED STATES ATTORNEY

Dated: 3/4/09

By: /s/ Gretchen Lundgren  
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CERTIFICATE OF SERVICE

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

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Gretchen Lundgren  
Special Asst. U.S. Attorney

Date: 3/4/09